

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION, *et al.*,

Defendants.

Case No. 2:24-cv-86-Z
District Judge Matthew J. Kacsmaryk

MOTION FOR LEAVE TO EXCEED PAGE LIMIT

1. Pending before the Court is Plaintiffs' 50-page motion for stay of agency action and preliminary injunction. *See* ECF No. 16.

2. On May 14, 2024, the Court granted Plaintiffs' motion to exceed the standard page limit for the pending motion, noting that "[t]here are 'extraordinary and compelling reasons' to extend the parties' page limits." ECF No. 15.

3. In order to effectively respond to Plaintiffs' lengthy motion, Defendants respectively request leave to exceed the normal 25-page limit for their brief in response, and to file a responsive brief of up to 50 pages.

4. Defendants have informed Plaintiffs that they will consent to an enlargement of the page limit for Plaintiffs' reply from 10 to 20 pages, and Plaintiffs consent to the requested enlargement of the page limit for Defendants' responsive brief.

5. A proposed order is attached.

Dated: June 13, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

EMILY B. NESTLER
Assistant Branch Director

/s/ Elizabeth Tulis

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Attorneys for Defendants

CERTIFICATE OF CONFERENCE

I certify that on June 12, 2024, I conferred by email with Ryan Walters, Chief, Special Litigation, Office of the Texas Attorney General, and Mr. Walters informed me that Plaintiffs consent to the relief requested in the above motion, “so long as [Defendants] will also consent to the same doubling for [Plaintiffs’] reply (to 20 pages from 10).” I informed Mr. Walters that Defendants will consent to that specified enlargement of the page limit for Plaintiffs’ reply.

/s/ Elizabeth Tulis

CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2024, I electronically filed this document with the Court by using the CM/ECF system, and that this document was distributed via the Court’s CM/ECF system.

/s/ Elizabeth Tulis